

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

KRISTIN KATHERINE BAISCH RICKER, on
behalf of herself and others similarly situated

Plaintiff,

vs.

DEBT RESOLUTION DIRECT LLC d/b/a DEBT
ADVISORS OF AMERICA

Defendant.

Case No. 25-cv-06972

PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff respectfully submits this Notice of Supplemental Authority to bring to the Court’s attention the recent decision in *Mujahid v. Newity, LLC*, 2025 U.S. Dist. LEXIS 221088 (N.D. Ill.) (Nov. 10, 2025), in which Judge Alonso directly addresses arguments raised in Defendant’s motion to dismiss. A copy of that decision is attached as Exhibit 1.

The Court in *Newity* undertook a full statutory-interpretation analysis and held that the phrase “telephone call,” as used in § 227(c), encompasses text messages. The Court’s conclusion rested on several grounds: (1) the ordinary meaning of a “call” includes attempts to communicate by telephone, which modern usage recognizes as including written text messages; (2) the structure of § 227 demonstrates that Congress intended consistent usage of the term “call” throughout the statute; (3) Supreme Court and other precedent interpreting “call” under § 227(b) uniformly holds that a text message is a call; (4) FCC guidance confirms that both voice calls and text messages are covered; and (5) the purpose of § 227(c)—protecting residential

subscribers from unwanted solicitations—would be undermined by excluding text message solicitations.

The decision provides persuasive support for Plaintiff’s position that unwanted text messages fall within the protections of § 227(c) and that Defendant’s motion to dismiss should be denied.

Dated: November 13, 2025

PLAINTIFF,
By his attorney

/s/ Anthony Paronich
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CERTIFICATE OF SERVICE

On November 13, 2025, I electronically served the foregoing document on counsel of record for the Defendant through the Court’s CM/ECF System.

/s/ Anthony Paronich